

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

VOLVO CAR USA LLC,

Plaintiff,

vs.

LEAR CORPORATION,

Defendant.

Civil Action No. 2:25-cv-04727-DCN

DEFENDANT'S ANSWER TO
LOCAL RULE 26.01
INTERROGATORIES

Pursuant to Local Civil Rule 26.01 of the United States District Court for the District of South Carolina, Defendant Lear Corporation ("Defendant"), by and through its undersigned attorneys, hereby answers Local Civil Rule 26.01 Interrogatories, as follows:

- (A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE:

Defendant is not aware of any persons or legal entities that may have a subrogation interest in this claim.

- (B) As to each claim, state whether it should be tried jury or non-jury and why.

RESPONSE:

Plaintiff has not requested a jury trial for either breach of contract claim. Defendant asserts a non-jury trial is appropriate.

- (C) State whether the party submitting these responses is a publicly owned company and separately identify (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly owned company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

RESPONSE:

Defendant Lear Corporation is a publicly owned company. The remaining portions of this interrogatory are not applicable to Defendant.

- (D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civ. Rule 3.01 (D.S.C.).

RESPONSE:

Plaintiff filed this action in state court in Berkeley County, South Carolina, which is in the Charleston Division of the United States District Court for the District of South Carolina.

- (E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE:

Defendant is not aware of any other related matter.

- (F) [Defendants only.] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE:

Defendant is properly identified.

- (G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

RESPONSE:

Defendant contends that no party or entity is liable to Plaintiff. Defendant, however, is not aware of any other person or legal entity that may be liable to it in this matter.

- (H) Parties or Intervenor in a Diversity Case. In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court’s jurisdiction under § 1332(a).

RESPONSE:

Defendant is Delaware corporation with its principal place of business in Michigan. There are no other individuals or entities whose citizenship is attributed to Defendant.

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